

OLSHAN FROME WOLOSKY LLP

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Hearing Date: June 21, 2023 at 10:00 a.m.

Objection Deadline: June 14, 2023 at 4:00 p.m.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Case No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

**AMENDED
NOTICE OF MOTION OF
DEFENDANTS TO EXTEND TIME
TO ANSWER OR OTHERWISE
RESPOND TO COMPLAINT**

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and the
Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

MALCOLM SAGE and LYNNE FLORIO,

Defendants.

Adv. Pro No. 23-01099 (CGM)

PLEASE TAKE NOTICE, that defendants Malcolm Sage and Lynne Florio, by and through counsel, will move (the “Motion”) before the Honorable Cecelia G. Morris, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”), One Bowling Green, Courtroom 621, New York, NY 10004, originally noticed for June 22, 2023 at 9:00 a.m. (ET) and which Motion is filed on Adv. Pro. No. 23-10199 at Dkt. No. 5 shall instead be heard on **June 21, 2023 at 10:00 a.m. (ET)** or as soon thereafter as Counsel may be heard, for the entry of an Order granting the accompanying Motion to extend the time for Defendants to answer or otherwise respond to the Complaint.

PLEASE TAKE FURTHER NOTICE, that objections if any, shall be in writing, shall conform to the Bankruptcy Code, the Bankruptcy Rules and Local Rules of the United States Bankruptcy Court for the Southern District of New York and shall be filed and served as follows, so as to be received no later than **June 14, 2023 at 4:00 p.m. (ET)** and such objections shall further (i) be filed with the Clerk of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004; (ii) be submitted in hard-copy form directly to the chambers of the Honorable Cecelia G. Morris, United States Bankruptcy Judge, at the Bankruptcy Court, One Bowling Green, New York, New York 10004 in accordance with Local Bankruptcy Rule 9070-1; and (iii) be served upon counsel to Defendants, Olshan Frome Wolosky LLP, 1325 Avenue of Americas, New York, New York 10019 Attn: Thomas J. Fleming (tfleming@olshanlaw.com) and Jonathan T. Koevary Esq (jkoevary@olshanlaw.com).

PLEASE TAKE FURTHER NOTICE, that the Hearing before Bankruptcy Judge Morris will be held via Zoom for Government. Any party that wishes to appear at the Zoom Hearing, whether making a “live” or “listen only” appearance before the Court, needs to register by **June 19, 2023 at 4:00 p.m. (ET)** an electronic appearance by going to Judge Morris’s chambers page

on the Court website, <https://www.nysb.uscourts.gov/content/chief-judge-cecelia-g-morris>, and clicking on the “eCourtAppearances” tab. The Hearing may be adjourned, from time to time, by announcement in open Court without any further or other notice thereof.

Dated: New York, New York
May 25, 2023

OLSHAN FROME WOLOSKY LLP

By: /s/ Jonathan Koevary
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